

JANUARY 23, 2008MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

TIG Insurance Company,)
)
Plaintiff,)
) Case No.
v.)
)
Global Reinsurance Corporation of)
America,)
)
Defendant.)

08 C 522**JUDGE GOTTSCHALL
MAGISTRATE JUDGE COX****NOTICE OF REMOVAL**

Defendant, GLOBAL Reinsurance Corporation of America, f/k/a Gerling Global Reinsurance Corporation of America (“GLOBAL”), pursuant to 28 U.S.C. Sections 1332, 1441, and 1446, hereby removes this action from the Circuit Court of Cook County, Illinois, County Department, Chancery Division, to the United States District Court for the Northern District of Illinois. In support hereof, GLOBAL states as follows:

1. GLOBAL is a named defendant in this lawsuit, which was filed by the plaintiff, TIG Insurance Company (“TIG”), on December 28, 2007 in the Circuit Court of Cook County, Illinois, County Department, Chancery Division, Case No. 07 CH 38625. At the present time, GLOBAL does not believe that it has been served with process; however, GLOBAL learned of this lawsuit on December 29, 2007.
2. Pursuant to the requirements of 28 U.S.C. § 1446(a), a copy of the Complaint is attached hereto as Exhibit 1. Since GLOBAL has not been served, it does not have a copy of the Summons. No other pleadings or other proceedings have been filed or taken to date.
3. This is a civil action over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332, and this is an action that can be removed to this Court pursuant to 28 U.S.C. § 1441, in that the parties are diverse:

- (a) Plaintiff, TIG, is a California corporation with its principal place of business in New Hampshire; and
- (b) At the time of the allegations set forth in the Complaint, at the time this action was commenced, and at the time of this notice of removal, Defendant, GLOBAL, was and is a New York corporation with its principal place of business in New York.

4. Plaintiff seeks a declaratory judgment from the Court and also seeks damages from GLOBAL for breach of contract in an amount in excess of \$75,000, exclusive of interest and costs.

5. The United States District Court for the Northern District of Illinois is the Federal District Court encompassing Cook County, Illinois. 28 U.S.C. § 93(a)(1).

6. Notice of removal is timely under 28 U.S.C. § 1446(b) because this Notice of Removal is filed within 30 days of December 29, 2007.

7. A true and correct copy of this Notice of Removal will be filed with the Clerk of the Circuit Court of Cook County, Illinois, Chancery Division.

DATED: January 23, 2008

Respectfully submitted,

s/ Mark G. Sheridan
One of the Attorneys for Defendant
GLOBAL Reinsurance Corporation of America

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 23, 2008, I electronically filed the foregoing Notice of Removal with the Clerk of the Court using the CM/ECF system. I further certify that a true and correct copy of the foregoing Notice of Removal was served to the attorneys shown below via U.S. Mail this 23rd day of January, 2008.

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s/ Mark G. Sheridan

One of the Attorneys for Defendant
GLOBAL Reinsurance Corporation of America